

1
2 UNITED STATES DISTRICT COURT
3 WESTERN DISTRICT OF NEW YORK
-----x

4 CORY EPPS,

5 Plaintiff,

6 v.

1:19-cv-00281-LJV

7 THE CITY OF BUFFALO, DETECTIVE
8 JOHN BOHAN, DETECTIVE
9 REGINALD MINOR, DETECTIVE
10 MARK STAMBACH, DETECTIVE
11 JAMES GIARDINA, DETECTIVE
12 ANTHONY CONSTANTINO,
13 DETECTIVE ROBERT CHELLA,
14 RANIERO MASSECHIA, CHARLES
15 ARONICA AND CHIEF JOSEPH RIGA,

16 Defendants.

17 -----x

18 October 29, 2021
19 11:02 a.m.

20 Videoconference deposition of
21 JACQUELINE BRADLEY, taken by plaintiff,
22 pursuant to subpoena, reported remotely by
23 Julia Liu, a Shorthand Reporter and Notary
24 Public of the State of New York.
25

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STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED, by
and between counsel for the respective
parties hereto, that all objections, except
as to form, are reserved to the time of
trial.

IT IS FURTHER STIPULATED AND AGREED
that the deposition may be signed and sworn
to before any officer authorized to
administer an oath.

IT IS FURTHER STIPULATED AND AGREED
that the sealing and filing of the
deposition be waived.

Bradley

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JACQUELINE BRADLEY,

called as a witness, having been duly
sworn, testified as follows:

EXAMINATION

BY MR. RICKNER:

Q. Good morning, Ms. Bradley.

A. Good morning.

Q. I just want to go over a few
ground rules.

MR. RICKNER: First, I just want
to confirm on the record that all
parties agree that this witness can be
sworn in virtually? I agree.

MR. RUSS: Fine with me.

Q. Excellent. Now, Ms. Bradley, I
don't know whether or not you've ever had
your deposition taken before, but I just
want to give you a few ground rules that
are designed to make sure that we get the
best and clearest record we can.

The first is is that you have to
give verbal answers. Even though you're on
video, the court reporter can't take down
uh-huh or nods of the head or gestures.

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You have to say yes or no or whatever your answer is verbally. Can you do that for me?

A. Yes.

Q. Okay. Also, you may know where I'm going with my long, rambling questions sometimes, but please wait until I finish my question before jumping in with an answer. That way, we get a nice clean question and answer on the record. Can you do that for me?

A. Yes.

Q. You're welcome to take a break whenever you want, just tell me. However, you do have to finish answering the question before taking the break.

A. Uh-huh.

Q. Yes?

A. No problem. Yes.

Q. And although you're testifying over Zoom, from your home I presume, this is like you are testifying in a court of law. You have to tell the truth, the whole truth, and nothing but the truth. Can you

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do that for me?

A. Yes.

Q. And this question may seem impertinent, but we have to ask it, which is do you have any medical reason why you couldn't give full and accurate testimony today?

A. No.

Q. Okay. Thank you. Did you discuss this deposition with anyone besides the court appearance yesterday?

A. No.

Q. Now, going back to May of 1997. Did there come a time when police officers showed you photographs in order for you to identify the person who killed Tomika Means?

A. Yes.

Q. When did they first start showing you photographs?

A. This was like, I want to say, a few weeks after she was killed. They came twice. It was these big books with a lot of pictures and stuff in them.

Bradley

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Q. Okay. So you say that the officers started showing up with photographs a few weeks after?

A. Yeah, I want to say like a few weeks after. It wasn't right away.

Q. Okay. Can you describe these books for me?

A. I'm trying to remember. I just know it was books and it was like -- it was plastic over the pictures. You know how you have like -- it was different pictures, it was like a lot of pictures. And it had like -- I mean like square, like -- it was just different pictures like of, you know, one of them binder-like books, I want to say, folder-like books or whatever. And I just know it was a lot of -- it was a lot of pictures. I know that.

Q. Okay. So I'm just trying to get an understanding of this book. Is it like one of those books that we would use for the old photo albums, where you put the pictures down and then there's the film that goes across and sort of sticks them in

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place?

A. Similar. I want to -- I can't remember, I really can't. I can't remember. I can't really remember like how the book -- I just know it was like a lot of pictures and it was like, you know, like it was plastic all over, you know, like the plastic thing over them, I know that. But I don't remember exactly like how the book was. But I know it was like one of them open books. And it was a lot of pictures.

Q. Okay. When you say a lot of pictures, do you mean like more than a hundred?

A. Yeah, I want to -- no, well, I'm trying to -- I mean all I know it was, I want to say it was probably -- it was a lot of pictures. I can't really remember. I can't really remember, yeah.

Q. Would it be correct to say that it was more than six?

A. Yeah, it was more than six.

Q. Okay. And the officers that came with the book, do you remember their names

Bradley

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2 or could you describe them?

3 A. No, I don't remember it. I
4 remember this short guy with the black
5 hair. I don't remember -- actually
6 remember their names. I remember the one
7 guy was short with black hair.

8 Q. Okay. Now, you said that the
9 officers came twice. The first time they
10 came, they showed you the book, is that
11 right?

12 A. Yeah, they showed me like a book.
13 They showed me the book. It was -- I
14 didn't notice anybody in that book because
15 -- it was like a book, but I didn't notice
16 anybody. But it was like, it was a book.
17 I want to say each page -- I want to say
18 like each page probably was, I want to say
19 maybe 10 people. You know how you just
20 keep flipping.

21 Q. Do you know how much time you
22 spent with that book?

23 A. No, I don't remember.

24 Q. Now, did the officers say
25 anything before they gave you that book?

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A. No. Only thing they said to me was like they was going to show me some pictures. And if I recognize the person or whatever, just to let them know. That was it basically.

Q. Okay. Now, prior to that, had you been shown any photographs at the precinct?

A. No. Prior to that, I did a suppository sketch or something like that before that.

Q. Okay.

A. Something -- what is it? You know what I'm talking about. They do like a sketch thing or whatever. I did that, I remember doing that.

Q. Is it called an identikit?

A. Yeah. What did I say?

MR. RUSS: Composite sketch.

Q. Composite.

A. Yes.

Q. I know what you meant.

Now, did you do that identikit, I think it was at the town of -- a town next

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door, right?

A. I don't remember. I just remember -- I remember going and I had to do one of them things. I don't remember exactly where.

Q. Okay. Now, after the first day when they brought the book, you said they came back a second time?

A. Yeah. I want to say, I want to say like a few weeks later, I want to say. I can't remember exactly like the time frame.

But I remember when they came back with the second book. I remember going through it. And I remember seeing a picture. And the picture caught me because it seems like I just zoned right in, heart start beating, crying. And I'm like that's him.

Q. Okay. And that was in one of those --

A. It was a book, yeah. It was whatever that book is.

Q. It's a similar book like with the

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10 pages per --

A. Yes.

Q. Excuse me. It's a similar book like you described before with like 10 photographs per page?

A. Yes.

Q. Okay. And you say you sort of zoned in on it.

A. Yeah.

Q. What did you say to the officers?

A. When I was looking through it, and when I seen him, I'm like it's him. And I broke down crying. And they, you know, he closed the book.

Q. Okay. Now, after that moment, did the officers ever come back for any additional --

A. No.

Q. Okay. Well, I want to show you some things that may refresh your recollection.

And I say that, but can I actually get the technology to work. Let's take a look. I want to make sure that this

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actually shows up. It's going to work out.
All right.

I'm sorry, and I don't want to
jump around. But after you identified that
person in the book, did the officers say
anything to you?

A. No. They just said, you know --
he just said that they'll contact me if
they need any further information. That's
the only thing that I remember.

Q. Okay. Great. Now, can you see
what's up on the screen right now?

A. Yes, I see a paper. But I can't
really see what it says or anything.

Q. All right. Well, let's zoom in a
little bit. Do you remember seeing any --
they're sort of folders -- where there's a
blue cover like this and then there's six
photographs inside?

A. I don't remember seeing that
paper.

Q. Okay. Well, I'm going to go to
the next page, and maybe this will refresh
your recollection.

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MR. RICKNER: And just for the record, this was previously marked as Exhibit 4 in another deposition. You see this page?

A. Yes.

Q. This is page 2 of Exhibit 4.

A. Yeah.

Q. Did you ever see a document or a folder with six photographs on it like this?

A. Like I told you, I don't know how many pictures is in it. I know it was a lot of pictures that I went through. So it could have been -- like I said, it was so long ago, I don't remember.

Q. Okay. Now, I just want to sort of zero in on this. This wouldn't have been in a book. What I'm saying is did you ever see a separate folder, completely separate from a book, with six photographs in it stuck in like this?

A. I don't -- I don't remember. I don't recall. I don't recall. I mean, like I said, it was so long ago. I don't

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remember.

Q. Okay. Now, I'm going to show you what was previously marked as Exhibit 9. Let me see if I can get this to scroll out.

Do you remember ever seeing -- maybe seeing these two together? This one's missing the person that was being identified. Does this refresh your recollection as to whether or not you ever saw -- it's called a photo array, with six photographs per page?

A. I really -- I don't remember. I mean I'm being real with you. I don't remember. I don't.

Q. Okay.

A. I remember looking at pictures. I really don't remember that, I really don't.

Q. Okay. This, I'm going to show what's been previously marked as Exhibit -- sorry, I have to open up one more exhibit.

This was previously marked as Exhibit 96. I'm going to rotate the page display real quickly. Do you remember

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seeing -- I know you -- do you remember
seeing a document like this, or this
specific document previously marked as
Exhibit 96?

A. No, I really don't remember. I
really don't.

Q. Now, all right. This is actually
the wrong way up, so let me rotate this for
you. Do you see this notation in the
bottom left?

A. You said do I see it? Yeah.

Q. Yes, you can see it?

A. Uh-huh.

Q. Can you see it clearly? Or I can
zoom in.

A. No, because I kind of -- yeah, I
need you to zoom.

Q. Let me zoom in on this, the
handwriting. It's on the bottom left of
the second page of Exhibit 96. Can you see
it now?

A. Yes.

Q. Is this your handwriting?

A. Yes.

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Q. Do you remember signing this?

A. Honestly, no.

Q. Okay.

A. I really don't. It's just...

Q. Do you remember the circumstances
in which you signed this?

A. Yes.

Q. Okay. Describe the time that you
signed this.

A. It say 9:05 p.m. Like I said, I
don't -- it's been so long ago, so much
have happened, I don't remember.

Q. Okay. I understand.

Now, at some point, there was a
lineup, right?

A. Right.

Q. Okay. Now, you mentioned that
there were two times that the officers came
to your home. Did they come to your --
withdrawn.

You mentioned two times that the
officers came to your home. Between those
two times and the lineup, did the officers
ever come again to your home to show you

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any photographs?

A. No, not that I recall.

Q. Did they show you any photographs somewhere else; for example, having you come into the precinct during that time?

A. No, not that I recall, no.

Q. Okay. Now, when you got to the precinct for the lineup, prior to seeing the lineup, did the officers have a discussion with you?

A. They just -- I just remember them saying that they had, you know, that they -- for me, they was doing a lineup and everything, and for me to pick a number or something like that. That's all that I recall them saying to me.

Q. Okay. Besides saying pick a number, did they say anything else to you?

A. No, not that I recall.

Q. After the lineup, did they -- well, withdrawn.

Before the lineup, did you know that the person that you had identified was Cory Epps?

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A. No, no, I did not.

Q. Okay. After the lineup, did they tell you that the person you'd identified was named Cory Epps?

A. No. No, they didn't tell me. They never told me his name. How I found out his name was when they -- it was like, I want to say like after arrest. And it was, basically I found out his name basically after the -- after he was arrested and when stuff started being on TV and in the newspaper.

Q. Okay. Now, prior to May 26 of 1997, did you know Cory Epps?

A. No, I did not.

Q. Had you seen him around?

A. The face looked familiar, which I did, you know -- and after everything, the face, you know, after everything, the face looked familiar. But I never knew him. I never like encountered or anything like that with him. I never knew him.

Q. Okay. Now, after -- withdrawn. The books that you mentioned,

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were those just books of male faces?

A. Yes, it was just males. I want to recall -- I want to say yes.

Q. Now, if I understand correctly, there was also a female?

A. Yes.

Q. Yeah, there's a -- who was driving the car on May 26th?

A. Yes.

Q. Okay. Did you ever see photographs of females for identification?

A. No.

Q. After the trial, did you ever have any other interactions with the police? I mean with respect to this case.

I asked a bad question.

A. No. Only --

Q. Let me start over. I asked a bad question.

A. Only interaction --

Q. Sorry about that.

A. Only interaction that I had after this had happened, I was at work and a male and two females came to my job and the guy

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1 struck me in my face and told me if I
2 testified that he was going to kill my
3 family. That's the only interaction. I
4 did call the police that day. And I had
5 talked to whatever -- I can't remember the
6 detective's name. But it was -- I want to
7 say after that, that's like basically the
8 only thing I could remember that I had
9 really talked to the police about.
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11 And then I know that down the
12 line, after he had got arrested and he was
13 in jail, they came a couple of times, I
14 guess, when I guess he was trying to appeal
15 it or whatever.

16 Q. Okay. But what I'm asking is is
17 a little bit different.

18 A. Okay.

19 Q. After the trial, did the police
20 ever come to you with other photographs for
21 you to look at for identification?

22 A. No, not that I recall, no.

23 Q. All right. I'd just like to show
24 you -- this was previously marked as
25 Exhibit 75.

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A. Wait a minute, you know, wait a minute. Back, back.

I want to say they did come to me, I want to say after the trial, because they said something about some guy, Russell or whatever. And they asked me would I look at the picture, I looked at the picture. And he asked me did I know him, I said no. They asked me have I ever seen him before, and I said no.

Q. Okay. So they showed you a picture of somebody named Russell after the trial?

A. I want to say his name was Russell. This was like a while back after the trial.

Q. Was that just a single photograph of Russell?

A. I want to say yes, yes.

Q. Okay. How long after the trial do you think that was?

A. Really can't remember. I just -- I can't really remember.

Q. Okay. But would it have been

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within a year or so after the trial?

A. Honestly, I don't -- I really don't remember.

Q. Okay. Just to be clear, was it 10 years after the trial or more?

A. No. It was -- no, it was before then, yeah.

MR. RICKNER: Okay. So I'd just like to pull up a document that was previously marked as Exhibit 75. And I'm going to move to page 2.

Q. Do you remember -- and I can zoom in a little bit if that helps -- do you remember ever seeing a document like this with women's faces on it?

A. I don't remember, no.

Q. How about a document -- we're now on page 5 of Exhibit 75 -- do you ever remember seeing a document like this with women's faces on it?

A. I can't remember. I don't remember. I don't -- honestly, I don't remember. Yeah.

Q. Okay. Do you recognize any of

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these women, by the way?

A. No. Well, no, I do know one now because I met her not too long ago or not too far back ago. Number 5.

Q. Okay. How do you know Number 5?

A. Facebook.

Q. What's her name?

A. Honestly, I don't remember her name. I don't remember. But I did find out she was related to Cory because she friend requested me.

Q. Oh, okay. And you think she's related to Cory?

A. Well, to my understanding, people said she was related to her -- related to him.

Q. And to be clear, is she the female assailant from March 26?

A. No, no.

Q. Do you remember seeing a document -- we're on page 6 -- do you remember seeing a document like this?

A. No. I don't recall, no.

Q. All right. Now, I'd like to show

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you -- actually, hold on. I have to stop sharing for one second.

MR. RICKNER: We're going to mark this as Exhibit 105. It's a new one.

(Document Bates Stamped EPPS 00214 marked Exhibit 105 for identification)

MR. RICKNER: Going to zoom out a little bit. This is Epps 00214. We're marking it as Exhibit 105 for identification.

Q. Do you recognize the person in this exhibit?

A. Well, he look different now -- I mean compared to the way he looked now.

No. That's not Epps.

Q. That's correct. But I'm wondering if you recognize this person?

A. No, that's why I'm saying, I'm like he don't look like -- no, I don't.

Q. Okay. Do you know the name Russell Montgomery?

A. No. I just heard -- I told you that was the first time when the police had

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asked me did I know him, and I said no.

Q. Okay. More recently, have you learned anything about Russell Montgomery?

A. I heard people say that he -- something about a Pope guy they said that he was supposed to have killed. And they said something about he's saying that he killed Tomika. That's the only thing that I know, that, you know, that he's a bad guy.

Q. Okay. How did you find that out?

A. People talk, the streets, people talking. Like I said, people saying, oh, him and Cory look alike, or are you sure that's the right -- you know, hearing all that type of stuff, you know. That's how I heard of him, other than when the police had said his name.

Q. Okay. Now, more recently, let's say in 2016 or 2017 time frame, did the police come to talk to you about this case?

A. Yes, they asked me would I -- was I willing to retestify. And I told them I wanted to talk to her mother. And then I

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called them back and I told them, you know, no, because her mom -- this is what her mom wanted, she was like just let it go. You know, I didn't want to relive it, she didn't want to relive it, so I wanted the permission from her out of respect for her. And, you know, and she said no. And that's what I did and I told them no.

Q. And by her mother, you mean Ms. Means?

A. Agnes Means, yes.

Q. Besides testifying, did you give an interview with any officers or answer their questions around 2016 or 2017?

A. No. When he came, he was just, you know, he was just, you know -- he asked me, you know -- well, basically he was telling me that Cory had got like some team or whatever and he was trying to get out. They wanted to know if I wanted to retestify or anything. They wasn't asking me like no questions of the murder or anything like that, it was just asking me was I willing to retestify.

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Q. Okay. And when you say he, could you describe whoever he was?

A. It's the same guy, the short one with the black hair. I don't know his name. I'm sorry. I know short with the black hair, I mean. I'll know if I see him. I just don't remember his name.

Q. Okay. Well, let me give you a couple of names and see if you recognize any of them as the officers that you spoke with.

Do you remember a name John Bohan?

A. No.

Q. Do you remember the name Reginald Minor?

A. It don't sound familiar. I really don't remember their names, I really don't.

Q. Okay. Well, we're going to see what you remember and you can answer.

Do you remember the name Mark Stambach?

A. I want to say yes, but I'm not

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100 percent sure.

Q. Okay. Is it possible that Mark Stambach was one of the officers who spoke to you in 1997?

A. I can't say. I don't know.

Q. Okay. How about James Giardina?

A. I can't recall. I mean, like I said, I don't remember -- I can't really remember their names. I have their cards but I don't know where they're at. I don't remember the names.

Q. How about Anthony Constantino?

A. That name sound familiar.

Q. Okay. Do you remember --

A. That name, their name do sound familiar.

Q. Do you think he saw you more recently or back in 1997?

A. I want to say recently, I want to say.

Q. And what about Robert Chella?

A. Not for sure. No, I'm not 100 percent, I'm not for sure.

Q. What about Raniero Masecchia or

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Masecchia?

A. The name ring a bell, but I'm not sure.

But I remember the other guy. I remember that name, I remember that name.

Q. And how about Charles Aronica?

A. I'm not -- no, I'm not for sure.

Q. And how about Joseph Riga?

A. I'm not 100 percent sure.

Q. Okay. What about Juan Morales?

A. I'm not for sure. These names is -- I'm not for sure.

Q. Now, after you identified the assailant in the book the second time that the officers came up, did you sign anything that day?

A. I'm not for sure. I don't remember.

Q. Is it possible --

A. Like I said, this was so long ago. I don't -- honestly, I don't, I really don't. I mean I remember the stuff that happened that night but it's a lot that I don't remember. I don't remember.

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I can't answer that.

Q. I understand.

But at any time in 1997 or 1998, do you remember the officers giving you a piece of paper to sign to confirm who you had identified in the photos?

A. I don't remember, but they probably did nine out of ten times. But I'm not -- I mean, like I said, that part I really don't remember.

Q. When you say nine out of ten times, I'm sorry, what do you mean by that?

A. I mean I probably did, I probably did sign. You know, I mean, like I said, it's vague right there, but I don't really remember.

Q. Okay. Just hold on for one second, if you don't mind.

Now, do you remember telling the police that the assailant had bad skin, like pockmarks?

A. No. I said blemishes. It was like blemishes and it was like, you know, like from when you shave -- I don't know if

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it's shave, whatever, you know, like little blemishes.

Q. You mean like the razor bumps that then turn black?

A. Yeah, it was like -- yeah, it was like little blemishes.

Q. Okay. And do you remember saying that the assailant was about 5'9"?

A. I know he was taller than me -- well, I can't really say 'cause I was sitting. Yeah, I'd say about -- yeah, probably yeah, about 5 -- 5'8", 5'9", something like that.

But like I said, I was sitting in a car so...

MR. RICKNER: Understood.

All right. I don't think I have any other photo -- photographs, excuse me. I don't believe that I have any other questions for this witness.

Mr. Russ?

MR. RUSS: Thank you.

Ms. Bradley, I hope you won't be disappointed if I have no questions for

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you.

THE WITNESS: No, I'm okay.

MR. RUSS: I have no questions.

(Time noted: 11:33 a.m.)

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JACQUELINE BRADLEY

Subscribed and sworn to
before me this day
of 2021

CERTIFICATE

STATE OF NEW YORK)

) ss.

COUNTY OF NEW YORK)

I, Julia Liu, a Shorthand Reporter and
Notary Public within and for the State of
New York, do hereby certify:

That JACQUELINE BRADLEY, the witness
whose deposition is hereinbefore set forth,
was duly sworn by me and that such
deposition is a true record of the testimony
given by such witness.

I further certify that I am not
related to any of the parties to this action
by blood or marriage and that I am in no way
interested in the outcome of this matter.

JULIA LIU

October 29, 2021

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